

**EXHIBIT – A**

ENDORSED FILED  
SUPERIOR COURT

FEB 05 2021

COWLITZ COUNTY  
STACI MYKLEBUST, Clerk

SUPERIOR COURT OF WASHINGTON FOR COWLITZ COUNTY

STEWART WHITE,

Plaintiff,

v.

THE HOME DEPOT, HOME DEPOT  
U.S.A., INC.

Defendants.

No. 21 2 00083 08

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, STEWART WHITE, by and through his attorney, David  
A. Nelson, and for a claim against Defendants, alleges as follows:

I. JURISDICTION AND VENUE

1.1 The above Court has jurisdiction over the parties and subject matter herein  
alleged.

1.2 Venue is proper in Cowlitz County, Washington, pursuant to Revised Code of  
Washington (RCW) 4.12.025 (where the accident occurred).

II. PARTIES

2.1 The Plaintiff, STEWART WHITE, is resident of Kalama, Cowlitz County,  
Washington.

Complaint for Damages

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5 III. FACTS

8 3.2 At the time he was shopping he was a business invitee.

13            3.5    Striking the Plaintiff with the bar-b-que was negligent and reckless, and  
14    resulted in the injuries and damages set forth below.

16 4.1 The Plaintiff has suffered past, present, and future damages as follows:

19 a. Mental, physical, and emotional distress;  
20 b. Pain and suffering;  
21 c. Loss of the joys and amenities of life;  
22 d. Inconvenience;  
23 e. Disability; and

f. Loss of society and companionship.

4.1.2 Economic damages in an amount according to proof at the time of trial for, including but not limited to:

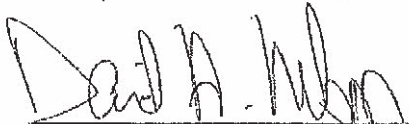
- a. Medical expenses of all kinds;
- b. Wage loss and/or earning capacity; and
- c. Mileage expenses associated with medical treatment.

WHEREFORE, the Plaintiff prays for judgment against the Defendants as follows:

1. For the above-stated damages in an amount according to proof at the time of trial;
2. For costs and reasonable attorney fees pursuant to RCW 4.84 et seq.;
- and
3. For such other and further relief as the Court deems just and equitable.

DATED 5<sup>th</sup> day of February, 2021.

NELSON LAW FIRM, PLLC



David A. Nelson WSB #19145  
Attorney for Plaintiff

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**CASE TYPE 2**  
**COWLITZ COUNTY SUPERIOR COURT**  
**CASE INFORMATION COVER SHEET**

Case Number 21-00083-08 Case Title WHITE v. HOME DEPOT

Attorney Name DAVID A. NELSON

Bar Membership Number 19145

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time in docketing new cases, but helps in forecasting needed judicial resources. Cause of action definitions are listed on the back of this form. Thank you for your cooperation.

Form Updated 12/28/2020

**APPEAL/REVIEW**

- ☐ Administrative Law Review (ALR 2)
- ☐ Appeal of a Department of Licensing Revocation (DOL 2)
- ☐ Civil, Non-Traffic (LCA 2)
- ☐ Civil, Traffic (LCI 2)

**CONTRACT/COMMERCIAL**

- ☐ Breach of Contract (COM 2)
- ☐ Commercial Contract (COM 2)
- ☐ Commercial Non-Contract (COL 2)
- ☐ Contractor Bond Complaint (COM 2)
- ☐ Third Party Collection (COL 2)

**PROTECTION ORDER**

- ☐ Civil Harassment (HAR 2)
- ☐ Domestic Violence (DVP 2)
- ☐ Extreme Risk Protection Order (XRP 2)
- ☐ Foreign Protection Order (FPO 2)
- ☐ Sexual Assault Protection (SXP 2)
- ☐ Stalking (STK 2)
- ☐ Vulnerable Adult Protection (VAP 2)
- ☐ Extreme Risk Protection Order (XRP 2)
- ☐ Extreme Risk Prot. Order Under 18 (XRU 2)

**JUDGMENT**

- ☐ Abstract Only (ABJ 2)
- ☐ Foreign Judgment (FJU 2)
- ☐ Judgment, Another County (ABJ 2)
- ☐ Judgment, Another State (FJU 2)
- ☐ Tax Warrant (TAX 2)
- ☐ Transcript of Judgment (TRJ 2)

**OTHER COMPLAINT/PETITION**

- ☐ Abusive Litigation (ABL 2)
- ☐ Action to Compel/Confirm Private Binding Arbitration (MSC 2)
- ☐ Ballot Title (BAT 2)
- ☐ Change of Name (CHN 2)
- ☐ Petition for Certificate of Restoration of Opportunity (CRP 2)
- ☐ Deposit of Surplus Funds (MSC 2)
- ☐ Emancipation of Minor (EOM 2)
- ☐ Injunction (INJ 2)
- ☐ Interpleader (MSC 2)
- ☐ Malicious Harassment (MHA 2)
- ☐ Minor Settlement (No guardianship) (MST 2)

- ☐ Petition for Civil Commitment (Sexual Predator)(PGC 2)
- ☐ Property Damage-Gangs (PRG 2)
- ☐ Restoration of Firearms Rights (RFR2)
- ☐ Public Records Act (PRA 2)
- ☐ Relief from Duty to Register (RDR2)
- ☐ School District - Required Action Plan (SDR 2)
- ☐ Seizure of Property from Commission of Crime (SPC 2)
- ☐ Seizure of Property Resulting from a Crime (SPR 2)
- ☐ Subdivision Election Process Review (SER 2)
- ☐ Subpoenas (MSC 2)
- ☐ Voter Election Law Review (VEP 2)

**PROPERTY RIGHTS**

- ☐ Condemnation (CON 2)
- ☐ Foreclosure (FOR 2)
- ☐ Land Use Petition (LUP 2)
- ☐ Property Fairness (PFA 2)
- ☐ Quiet Title (QTI 2)
- ☐ Unlawful Detainer (UND 2)

**TORT, MEDICAL MALPRACTICE**

- ☐ Hospital (MED 2)
- ☐ Medical Doctor (MED 2)
- ☐ Other Health Care Professional (MED 2)

**TORT, MOTOR VEHICLE**

- ☐ Death (TMV 2)
- ☐ Non-Death Injuries (TMV 2)
- ☐ Property Damage Only (TMV 2)
- ☐ Victims of Motor Vehicle Theft (VVT 2)

**TORT, NON-MOTOR VEHICLE**

- ☐ Asbestos (PIN 2)
- ☐ Other Malpractice (MAL 2)
- ☒ Personal Injury (PIN 2)
- ☐ Products Liability (TTO 2)
- ☐ Property Damage (PRP 2)
- ☐ Wrongful Death (WDE 2)

**WRIT**

- ☐ Habeas Corpus (WHC 2)
- ☐ Mandamus (WRM 2)
- ☐ Restitution (WRR 2)
- ☐ Review (WRV 2)
- ☐ Miscellaneous Writs (WMW 2)

IF YOU CANNOT DETERMINE THE APPROPRIATE CATEGORY, PLEASE DESCRIBE THE CAUSE OF ACTION BELOW.

**Please Note: Public information in court files and pleadings may be posted on a public Web site.**